

996 South Main Street
Meadville, Pennsylvania 16335
May 2, 1969

CERTIFIED MAIL

Subject: Industrial Wastes
Hammermill Paper Company
Erie, Erie County

Dr. Richard W. Brown,
Assistant Vice-President
Hammermill Paper Company
Erie, Pennsylvania 16500

Dear Dr. Brown:

This is to acknowledge receipt of your letters dated October 10, November 18, 1968 and January 20, 1969 concerning your deep wells for disposal of your spent pumping liquors which cannot be accepted as completely satisfactory towards compliance with Sanitary Water Board requirements.

We can accept the fact that failure of either deep well No. 1 or No. 3 is highly unlikely with the modified design and construction of these wells and the non-corrosive materials used for the injection tubing and the surface piping. However, we cannot concur with you that there is no possible chance of failure, in that problems may arise which have not arisen previously. The permits for well No. 3 and modified well No. 1 would not have been issued if we had not been satisfied with the modified design and construction of these wells and the materials for construction that were used.

✓ However, we cannot concur with an even short duration discharge of spent pulping liquors to the waters of the Commonwealth should well No. 3 or its auxiliary equipment fail and a portion of the wastes be discharged, because well No. 1 does not have sufficient capacity to accept all the spent pulping liquors produced daily. We cannot concur with the first sentence on page 2 of your January 29, 1969 letter which states that "it is impossible to guard against all possibilities that can be imagined." We feel that further measures can and must be taken to assure that no unauthorized discharge of spent pulping liquors will occur to the waters of the Commonwealth.

Also, we cannot concur with the last paragraph on page 2 of your January 29, 1969 letter in which you state that "the successful operation of No. 1 and No. 3

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#1, 2, 3 wells

Dr. Richard A. Leman

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wells and the lack of problem with No. 2 on a standby condition serves to confirm our conclusions that the wells are secure and won't fail in any way." We do not feel that the modified wells have been in operation long enough to draw such conclusions.

This is to remind you that your Company is expected to comply with Special Condition F of your permits for both wells No. 1 and No. 3. Special Condition F states that "the discharge of untreated or improperly treated industrial wastes to the waters of the Commonwealth is contrary to the requirements of the Sanitary Water Board. If, because of accidental breakdown of the treatment works or plant equipment or for other reason, any such discharge should occur, then operation of the mill or process producing such discharge shall be discontinued until repairs to the treatment works or other satisfactory measures to prevent stream pollution shall have been completed."

Therefore, on or before May 15, 1969 we will expect to receive a satisfactory time schedule of steps you plan to take to assure that there will be no unauthorized discharge of spent pulping liquors to the waters of the Commonwealth.

You must (1) agree to discontinue operation of the mill or process producing the spent pulping liquors, (2) provide adequate storage facilities to store the spent pulping liquors, (3) restore No. 2 well to operable condition, or (4) provide some other satisfactory method to assure that there will be no unauthorized discharge of spent pulping liquors to the waters of the Commonwealth.

Your schedule must call for expeditiously completing measures to insure against a discharge. The accident you reported to us on April 25, 1969 substantiates the need for expeditious further assurance against a discharge. This requirement is consistent with our Pollution Incident Prevention Program.

Please advise us if you decide to restore well No. 2 to operation at any time as it will be necessary to submit revised plans and reports to us for approval, although it does not appear it will be necessary to apply for a new permit.

Unless a satisfactory schedule is received by May 15, 1969, we will have no alternative but to take steps immediately to have your permits suspended and immediately to refer this case to our Office of Legal Counsel for action to compel complete compliance.

Very truly yours,

Wayne C. Ballaman
Regional Sanitary Engineer
Human Services Region VI

KUB:jfb

CC: Erie County Health Department
CC: Div. of Industrial Wastes
CC: Div. of Water Quality
(Messers, Boardman, Lurich & Schoener)
C.C. John M. Lerman, H.D.

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